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15 Attorneys for Plaintiff Shane Chen

16  
17 UNITED STATES DISTRICT COURT  
18 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
19 WESTERN DIVISION

20 SHANE CHEN, a Washington resident,  
21 Plaintiff,  
22 v.  
23 SOIBATIAN CORPORATION, dba IO  
24 HAWK and dba SMART WHEELS, a  
25 California corporation,  
26 Defendant.

Case No.: LA CV15-04562-JAK  
(JPRx)

REQUEST TO CLERK TO ENTER  
DEFAULT AGAINST SOIBATIAN  
CORPORATION, dba IO HAWK  
and dba SMART WHEELS

27 **TO THE CLERK OF THE ABOVE ENTITLED COURT:**

28 Plaintiff, SHANE CHEN, hereby requests the Clerk of the above-captioned  
Court enter default in this matter against Defendant SOIBATIAN CORPORATION,  
dba IO HAWK and dba SMART WHEELS, on the ground that said defendant failed

1 to appear or otherwise respond to the Complaint within the time prescribed by the  
2 Federal Rules of Civil Procedure. Plaintiff served defendant, SOIBATIAN  
3 CORPORATION, via service on the domestic corporation place of business, on  
4 August 26, 2015. The service of process is evidenced by the proof of service of  
5 summons filed with this Court.

6 The above stated facts are set forth in the accompanying declaration of Paul N.  
7 Tauger, filed herewith.

8  
9 Dated: September 30, 2015

10 **APOGEE LAW GROUP**

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12 By: /s/ Paul N. Tauger  
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